



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF



March 23, 2016

The Honorable Hilda L. Solis
Chair, Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012

Dear Supervisor Solis:

LOS ANGELES COUNTY PHARMACEUTICALS, SHARPS COLLECTION AND DISPOSAL STEWARDSHIP ORDINANCE – NOTICE OF SUPPORT

The Los Angeles County Sheriff's Department supports the adoption of the Los Angeles County Pharmaceuticals, Sharps Collection and Disposal Stewardship Ordinance. As you know, the Sheriff's Department served as a member of the County EPR Working Group, which led by the Chief Executive Office, coordinated a stakeholder driven process to develop the draft Ordinance being presented to your Board.

The safe handling and disposal of Pharmaceuticals and Sharps is very important to our Department. In 2009, the Sheriff's Department launched the Safe Drug Drop-Off Program, which continues to provide self-serve drop boxes for the collection of home-generated Sharps waste and Pharmaceutical waste at 21 Sheriff's stations. The program was established to provide an opportunity for residents to safely and anonymously drop-off expired or unused drugs, Sharps waste, and other controlled substances.

Without safe and convenient options for unwanted Pharmaceuticals and Sharps, there is a significant risk of harm to our residents, including the diversion of controlled substances which may lead to abuse, addiction, overdose, and even death. Prescription drug abuse is a rising epidemic, nationwide, creating a black market trade for a variety of controlled substances. As part of a comprehensive approach to battling

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this epidemic, it is vital to establish a variety of convenient and safe options for residents to properly dispose of their medications to keep them out of the hands of children, other family members, or anyone else that might pilfer the medicine cabinet. Of note, nearly 75 percent of residents who misuse prescription drugs obtain them from relatives or friends.

While we feel our program is a great service to the residents in the County, we do not feel it is convenient for all residents. Furthermore, we recognize not everyone may feel comfortable bringing these materials to a law enforcement facility. It should also be noted that in some locations, the current program is being overwhelmed by participants, despite the relatively low awareness by many residents and established drop-offs at our Sheriff's stations.

Ultimately, having this program funded solely by our Department is unsustainable from a financial standpoint. It is clear that a sustainable funding mechanism is needed to establish convenient and safe collection options for residents. In 2010, Congress passed the Secure and Responsible Drug Disposal Act, specifically for the purpose of expanding available options to collect and dispose of controlled substances in a secure, convenient and responsible manner. Consistent with this Act, the Federal Drug Enforcement Agency (DEA) developed regulations to expand take-back programs. Additionally, the Federal Environmental Protection Agency and the Federal Food and Drug Administration have both identified local take-back programs as the "first choice" or "best option" for safely and conveniently collecting these products. This is precisely what the proposed draft ordinance would provide County residents.

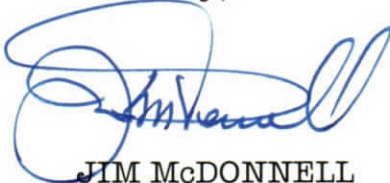
Drug manufacturers have proposed an alternative plan that would encourage residents to dispose of drugs in the trash, after mixing them with kitty litter or coffee grounds. The industry's proposal raises a number of serious safety concerns. Firstly, the need to mix the drugs with kitty litter or coffee grounds make it less convenient for residents to dispose of their drugs, making it less likely that residents will follow the instructions. Secondly, handling drugs as suggested by the manufacturers increases the potential for residents to be exposed to medications via skin contact or inhalation. In addition, even when mixed with kitty litter or coffee grounds, the drugs are not considered irretrievable, leaving the possibility of further exposure by pets, children or even scavengers. Promoting residents to dispose of drugs in the trash is not a viable option, and is illegal for Sharps. Environmental concerns are also inadequately addressed.

The Sheriff's Department will continue to be part of the solution, as necessary, by providing a location for these bins, but we recognize the need for additional locations for bins and additional education and outreach. Therefore, we appreciate your Board taking the initiative to direct the Chief Executive Office, in collaboration with the County Sustainability Council, and the EPR Working Group, to draft an ordinance.

We have participated in the stakeholder outreach process, including the Technical Advisory Group meetings which consisted of representatives from the Pharmaceutical and Sharps manufacturers, retail associations, environmental and advocacy groups, and many others. We have also participated in many briefings with your staff to educate them on the steps the EPR Working Group has taken, including addressing comments submitted from stakeholders.

We believe the Board's passage of this ordinance will have a great benefit to the residents of the County by reducing the possibility of prescription drug abuse and potentially save lives from accidental or intentional drug overdose.

Sincerely,



JIM McDONNELL
SHERIFF